

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

1. SAFWAN MADARATI,
a.k.a. "Sammy,"
2. VARTAN A. SOUKIASIAN,
a.k.a. "V,"
3. HAGOP N. SARKISSIAN,
a.k.a. "Jack,"
4. ANTRANIC IDANJIAN,
a.k.a. "Anto,"
5. ROBERT JOHNSON,
a.k.a. "Bobby,"
6. SANUSIE MO KABBA,
7. JEFFREY SPINKS,
8. KARAPET DZHANIKYAN,
a.k.a. "Garro,"
9. RONALD J. MARTINEZ,
10. VICTOR LOUKAS,
a.k.a. "Vic,"
11. MANUEL KHANDJIAN,
a.k.a. "Manos,"
a.k.a. "Baldy,"
12. ANTOINE HAGE MOUSSA,
13. ROBERTO VELASQUEZ-JOHNSON,
a.k.a. George Diamond,
14. GARABET JARTIDIAN,
15. NICOLAS ANTHIS,
16. ILIAS KAPERONIS,
17. NICHOLAS SOTIRIOU, and
18. DOMENICO GUZZI

Defendants.

Criminal No. 11-10195-GAO

VIOLATIONS:

- 21 U.S.C. §§ 846, 841(a)(1)
841(b)(1)(A)(vii), and
841(b)(1)(C) - Conspiracy
to Distribute 1,000 Kilograms
or More of Marijuana,
Oxycodone, and Cocaine
- 18 U.S.C. § 894(a) -
Conspiracy to Collect Debt
by Extortionate Means
- 18 U.S.C. § 371 - Conspiracy
to Defraud the United States
- 18 U.S.C. § 1001(a) - Making a
Materially False Statement
- 18 U.S.C. § 1956(h) -
Conspiracy to Launder Monetary
Instruments
- 18 U.S.C. § 2 - Aiding and
Abetting
- 21 U.S.C. §§ 853 - Drug Asset
Forfeiture Allegation
- 18 U.S.C. § 981(a)(1)(C) and
28 U.S.C. § 2461(c) -
Extortionate Debt Collection
Forfeiture Allegation
- 18 U.S.C. § 982(a)(1) - Money
Laundering Forfeiture
Allegation

INDICTMENT

COUNT ONE: (Title 21, United States Code, Section 846 -
Conspiracy to Distribute Marijuana, Oxycodone, and
Cocaine)

The Grand Jury charges that:

From a date unknown, but not later than from in or about
June 2010, and continuing until on or about April 20, 2011, at
Watertown, Newton, Bedford, Burlington, and elsewhere in the
District of Massachusetts, the Eastern District of New York, the
District of Nevada, the Southern District of California, Canada,
and elsewhere,

1. SAFWAN MADARATI,
a.k.a. "Sammy,"
2. VARTAN A. SOUKIASIAN,
a.k.a. "V,"
3. HAGOP N. SARKISSIAN, s
a.k.a. "Jack,"
4. ANTRANIC IDANJIAN,
a.k.a. "Anto,"
5. ROBERT JOHNSON,
a.k.a. "Bobby,"
6. SANUSIE MO KABBA,
- 7 JEFFREY SPINKS,
8. KARAPET DZHANIYAN,
a.k.a. "Garro,"
10. VICTOR LOUKAS,
a.k.a. "Vic,"
11. MANUEL KHANDJIAN,
a.k.a. "Manos,"
a.k.a. "Baldy,"
12. ANTOINE HAGE MOUSSA, and
14. GARABET JARTIDIAN,

defendants herein, did knowingly and intentionally combine,
conspire, confederate, and agree with each other and other

persons, known and unknown to the Grand Jury, to distribute and possess with the intent to distribute controlled substances, to wit: marijuana, a Schedule I controlled substance; oxycodone, a Schedule II controlled substance; and cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the conspiracy described herein involved at least one thousand (1000) kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(vii) applies to this count.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO: (18 U.S.C. § 894(a) - Conspiracy to Collect Debt
by Extortionate Means)**

From in or about December, 2010, and continuing until on or about April 20, 2011, at Newton, Watertown, and elsewhere in the District of Massachusetts, in the Southern District of Florida, in Canada, and elsewhere,

1. **SAFWAN MADARATI,**
a.k.a. "Sammy,"
3. **HAGOP N. SARKISSIAN,**
a.k.a. "Jack,"
6. **SANUSIE MO KABBA, and**
9. **RONALD J. MARTINEZ,**

the defendants herein, did willfully and knowingly conspire, confederate, and agree with one another and with others known and unknown to the Grand Jury to participate in the use of extortionate means within the meaning of Title 18, United States Code, Section 891(7), to collect, and attempt to collect, extensions of credit and to punish for the nonrepayment thereof.

All in violation of Title 18, United States Code, Section 894.

COUNT THREE: (Title 21, United States Code, Section 856(a)(1) - Maintaining a Place for Drug Purposes; Title 18, United States Code, Section 2 - Aiding and Abetting)

From in or about February 2011 and continuing until on or about April 20, 2011, at Watertown and elsewhere in the District of Massachusetts,

1. **SAFWAN MADARATI,**
a.k.a. "Sammy,"
2. **VARTAN A. SOUKIASIAN,**
a.k.a. "V,"

defendants herein, did knowingly and intentionally use and maintain a place, to wit; 10 Oakley Road, Garden Apartment, Watertown, Massachusetts, for the purpose of manufacturing, and distributing controlled substances, specifically marijuana and and 3,4-Methylenedioxymethamphetamine/MDMA, also known as "Ecstasy."

All in violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

**COUNT FOUR: (Title 18, United States Code, Section 371 -
Conspiracy to Defraud the United States)**

The Grand Jury further charges that:

A. Introduction

At all times relevant to this Indictment:

1. Immigration and Customs Enforcement ("ICE") is the principal investigative arm of the U.S. Department of Homeland Security ("DHS") an agency of the Executive Branch of the United States Government. Within ICE, Special Agents from Homeland Security Investigations ("HSI") investigate a wide range of domestic and international activities arising from the illegal movement of people and goods into, within and out of the United States including the smuggling of illegal drugs.

2. Beginning in approximately June 2010, and continuing until the date of the filing of this Indictment, Special Agents from HSI in Massachusetts, along with Special Agents from the U.S. Drug Enforcement Administration ("DEA") and state and local law enforcement agents, were investigating the suspected drug trafficking activities of **SAFWAN MADARATI, a.k.a. "Sammy"** in and around the area of Watertown, Massachusetts. During this same time, HSI Special Agents were authorized to investigate and make arrests for violations of the Controlled Substances Act and the Controlled Substances Import and Export Act in Title 21 of the United States Code ("CSA") and were authorized to issue

administrative subpoenas for documents and records.

3. Between at least June 2010, and continuing until on or about November 29, 2010, **ROBERTO VELASQUEZ-JOHNSON, a.k.a. George Diamond** was employed as a police officer with the Watertown Police Department.

B. The Charge

From in or about June 2010, and continuing until on or about April 21, 2011, at Watertown and elsewhere in the District of Massachusetts, and elsewhere,

1. **SAFWAN MADARATI,**
a.k.a. "Sammy," and
13. **ROBERTO VELASQUEZ-JOHNSON,**
a.k.a. George Diamond,

defendants herein, did knowingly and intentionally combine, conspire, confederate, with each other and other persons, known and unknown to the Grand Jury, to defraud an agency of the United States, that is, the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations, also known as "ICE," by impeding, impairing, obstructing and defeating the lawful functions of said agency of the United States in the investigation of violations of the Controlled Substances Act and the Controlled Substances Import and Export Act in Title 21 of the United States Code.

C. Manner and Means of the Conspiracy

It was part of the conspiracy that:

1. **SAFWAN MADARATI, a.k.a. "Sammy"** used his personal connections with members of the Watertown Police Department, including, **ROBERTO VELASQUEZ-JOHNSON, a.k.a. George Diamond**, to obtain information about law enforcement activity in order to impede and obstruct investigations into his drug trafficking activities in Watertown, Massachusetts.

2. By virtue of his employment as a police officer with the Watertown Police Department until November 29, 2010, **ROBERTO VELASQUEZ-JOHNSON, a.k.a. George Diamond**, obtained information about an ongoing drug investigation that ICE had begun into the drug trafficking activities of **SAFWAN MADARATI, a.k.a. "Sammy."**

D. Overt Acts

In furtherance of this conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed at Watertown, Waltham, Arlington, and elsewhere in the District of Massachusetts and elsewhere:

1. In or about June 2010, after police officers from the Watertown Police Department and a HSI Special Agent from ICE seized \$70,040 in drug proceeds from **SAFWAN MADARATI, a.k.a. "Sammy"** on June 14, 2010, in Watertown, Massachusetts, **ROBERTO VELASQUEZ-JOHNSON, a.k.a. George Diamond** warned **MADARATI** that law enforcement agents from "ICE" were investigating **MADARATI**.

2. During a telephone call on or about September 27, 2010, **ROBERTO VELASQUEZ-JOHNSON, a.k.a. George Diamond**, told **SAFWAN**

MADARATI, a.k.a. "Sammy" that someone was making him out to be biggest "mule" in Massaschusetts, mentioned "ICE," and told **MADARATI** that was "someone was talking" whom **VELASQUEZ-JOHNSON** referred to as "rats."

3. During a phone call on or about April 20, 2011, at approximately 11:05 a.m., **ROBERTO VELASQUEZ-JOHNSON, a.k.a. George Diamond**, provided **SAFWAN MADARATI, a.k.a. "Sammy"** the residential home addresses of two local law enforcement officers in order for **MADARATI** to intimidate these two local law enforcement officers and protect his drug distribution activities.

All in violation of Title 18, United States Code, Section 371.

COUNT FIVE: (Title 18, United States Code, Section 1001 - Making a Material False Statement)

The Grand Jury further charges that:

On or about April 21, 2011, at Arlington in the District of Massachusetts,

**13. ROBERTO VELASQUEZ-JOHNSON,
a.k.a. George Diamond,**

defendant herein, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of a department and agency of the United States by stating to a Special Agent of the U.S. Drug Enforcement Administration and a Special Agent of the Federal Bureau of Investigation that he had not spoken with **SAFWAN MADARATI, a.k.a. "Sammy"** for about a week, when in fact he had spoken with **SAFWAN MADARATI** the day before, on April 20, 2011.

All in violation of Title 18, United States Code, Section 1001.

11

COUNT SIX: (Title 18, United States Code, Section 1001 -
Making a Material False Statement)

The Grand Jury further charges that:

On or about April 21, 2011, at Arlington in the District of
Massachusetts,

13. **ROBERTO VELASQUEZ-JOHNSON,**
a.k.a. George Diamond,

defendant herein, did willfully and knowingly make a materially
false, fictitious, and fraudulent statement and representation in
a matter within the jurisdiction of a department and agency of
the United States by stating to a Special Agent of the U.S. Drug
Enforcement Administration and a Special Agent of the Federal
Bureau of Investigation that he had only spoken with **SAFWAN**
MADARATI, a.k.a. "Sammy" over one of **MADARATI's** cellular phone
numbers, phone number (617) 335-2078, when in fact he had spoken
with **MADARATI** over three other of **MADARATI's** cellular phone
numbers, including phone number (339) 204-3901 the day before on
April 20, 2011.

All in violation of Title 18, United States Code, Section
1001.

COUNT SEVEN: (Title 18, United States Code, Section 1001 - Making a Material False Statement; Title 18, United States Code, Section 2 - Aiding and Abetting)

The Grand Jury further charges that:

On or about October 20, 2010, at Bridgewater in the District of Massachusetts,

- 15. NICOLAS ANTHIS, and**
- 16. ILIAS KAPERONIS,**

defendants herein, did willfully and knowingly make and cause to be made materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of a department and agency of the United States by stating to Special Agents of the U.S. Drug Enforcement Administration and the U.S. Department of Homeland, Immigration and Customs Enforcement, that the \$1,041,990.00 in U.S. currency that law enforcement agents seized in Newtwn, Massachusetts on October 5, 2010, was derived from legitimate investors in the United States for the purchase of gold, when in fact the defendants herein knew that said U.S. currency was the proceeds of drug trafficking.

All in violation of Title 18, United States Code, Sections 1001 and 2.

COUNT EIGHT: (Title 18, United States Code, Section 1956(h) - Money Laundering Conspiracy)

The Grand Jury further charges that:

From an unknown date but at least by in or about October, 2010 and continuing up to and including the date of this Indictment, at Watertown, Netwon, Bedford, Cambridge, and elsewhere in the District of Massachusetts, in the Eastern District of New York, the Southern District of California, the District of Nevada, and elsewhere in the United States, in Canada and elsewhere,

1. **SAFWAN MADARATI,**
a.k.a. "Sammy,"
14. **GARABET JARTIDIAN,**
15. **NICOLAS ANTHIS,**
16. **ILIAS KAPERONIS,**
17. **NICHOLAS SOTIRIOU, and**
18. **DOMENICO GUZZI,**

defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and other individuals known and unknown to the Grand Jury to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity and which in fact involved the proceeds of a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance and, with respect to

financial transactions occurring in whole and in part in the United States, an offense against a foreign nation involving the manufacture, importation, sale, and distribution of a controlled substance:

(A) with the intent to promote the carrying on of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

(B) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

**DRUG FORFEITURE ALLEGATION: (Title 21, United States Code,
Section 853)**

The Grand Jury further charges that:

1. Upon conviction of one or more of the offenses alleged
in Counts One and Three of this Indictment,

1. SAFWAN MADARATI,
a.k.a. "Sammy,"
2. VARTAN A. SOUKIASIAN,
a.k.a. "V,"
3. HAGOP N. SARKISSIAN,
a.k.a. "Jack,"
4. ANTRANIC IDANJIAN,
a.k.a. "Anto,"
5. ROBERT JOHNSON,
a.k.a. "Bobby,"
6. SANUSIE MO KABBA,
7. JEFFREY SPINKS,
8. KARAPET DZHANIKYAN,
a.k.a. "Garro,"
10. VICTOR LOUKAS,
a.k.a. "Vic,"
11. MANUEL KHANDJIAN,
a.k.a. "Manos,"
a.k.a. "Baldy"
12. ANTOINE HAGE MOUSSA, and
14. GARABET JARTIDIAN,

defendants herein, shall forfeit to the United States, pursuant
to Title 21, United States Code, Section 853: (1) any and all
property constituting or derived from any proceeds obtained
directly or indirectly as a result of the charged offenses; and
(2) any and all property used or intended to be used in any
manner or part to commit or to facilitate the commission of the
offenses. The property to be forfeited includes, but is not
limited to, the following:

- (a) A sum of money equal to the total amount of money involved in the offenses, which may be entered in the form of a joint and several forfeiture money judgment;
- (b) \$1,041,990.00 in United States currency seized on October 5, 2010, in Newton, Massachusetts;
- (c) \$1,766,900.00 in United States currency seized on October 27, 2010, in Lexington, Massachusetts;
- (d) \$460,090.00 in United States currency seized on April 20, 2011, at 80 Warren Street, Waltham, Massachusetts;
- (e) \$99,540.00 in United States currency seized on April 20, 2011, at 26 Sherman Street, Cambridge, Massachusetts;
- (f) 7 gold bars valued at approximately \$364,000.00 seized on April 20, 2011, at 26 Sherman Street, Cambridge, Massachusetts;
- (g) \$102,525.00 in United States currency seized on April 20, 2011, at 19 Sylvan Lane, Boylston, Massachusetts;
- (h) \$10,293.00 in United States currency seized on April 20, 2011, at 14 Lexington Street, Stoneham, Massachusetts;
- (i) \$6,519.00 in Foxwoods Casino Chips seized on April 20, 2011, at 14 Lexington Street, Stoneham, Massachusetts;
- (j) \$10,275.00 in United States currency seized on April 20, 2011, from 185 Warren Street, Watertown, Massachusetts;
- (k) \$22,900.00 in United States currency seized on April 21, 2011, from Safety Deposit Box Number 2013 at Watertown Saving Bank, Warrendale Branch, 60 Main Street, Watertown, Massachusetts;
- (l) \$78,955.41 in United States currency seized from Bank of America account number ending in 0889, held in the name Safwan Plumbing and Heating/SAFWAN MADARATI;

- (m) \$21,108.58 in United States currency seized from Bank of America account number ending in 7899, held in the name SAFWAN MADARATI;
- (n) one 2004 Mercedes Benz S430, bearing VIN WDBNG83J44A394539 and Massachusetts registration 566LL3;
- (o) one 2004 Mercedes E55 AMG, bearing VIN WDBUF76J34A482776 and a dealer registration;
- (p) one 2008 Jeep Grand Cherokee, bearing VIN 1J8HR58238C191170 and Massachusetts registration 94MY19;
- (q) one 2003 Dodge Ram 1500, bearing VIN 1D7HU16N63J576499 and Massachusetts registration 32DB82;
- (r) one 2005 Chevrolet Express Van, bearing VIN 1GCGG25V4S1104843 and Massachusetts registration L21613;
- (s) one 2006 Honda CBR Motorcycle, bearing VIN JH2SC57046M200441 and Massachusetts registration 2X3277;
- (t) one 2007 Infiniti FX 35 SUV, bearing VIN JNRAS08W17X210132 and Massachusetts registration 32ND16; and
- (u) one 2005 Mercedes E55 AMG, bearing VIN WDBUF76J05A786567 and Massachusetts registration 239FJ5.

2. If any of the above-described forfeitable properties, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. have been transferred or sold to, or deposited with, a third party;
- c. have been placed beyond the jurisdiction of the Court;

- d. have been substantially diminished in value; or
- e. have been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of property described in paragraph 1.

All pursuant to Title 21, United States Code, Section 853.

EXTORTIONATE DEBT COLLECTION FORFEITURE ALLEGATION:

(Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c))

The Grand Jury further charges that:

1. Upon conviction of the offense alleged in Count Two of this Indictment, each of the defendants,

1. **SAFWAN MADARATI,**
a.k.a. "Sammy,"
3. **HAGOP N. SARKISSIAN,**
a.k.a. "Jack,"
6. **SANUSIE MO KABBA, and**
9. **RONALD MARTINEZ,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from property traceable to such violation.

2. If any of the property described in paragraph 1 above, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 28,

United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of all other property of the defendants up to the value of the property described in paragraph 1.

All pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.

MONEY LAUNDERING FORFEITURE ALLEGATION: (Title 18, United States Code, Section 982(a)(1))

The Grand Jury further charges that:

1. Upon conviction of the offense alleged in Count Eight of this Indictment, each of the defendants,

1. **SAFWAN MADARATI,**
a.k.a. "Sammy,"
14. **GARABET JARTIDIAN,**
15. **NICOLAS ANTHIS,**
16. **ILIAS KAPERONIS,**
17. **NICHOLAS SOTIRIOU, and**
18. **DOMENICO GUZZI,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 982(a)(1), any property, real or personal, involved in the offense, and all property traceable to such property. The property to be forfeited includes, but is not limited to,

- (a) A sum of money equal to the total amount of money involved in the offense, which may be entered in the form of a joint and several forfeiture money judgment;
- (b) \$1,041,990.00 in United States currency seized on October 5, 2010, in Newton, Massachusetts;
- (c) \$1,766,900.00 in United States currency seized on October 27, 2010, in Lexington, Massachusetts;
- (d) \$78,955.41 in United States currency seized from Bank of America account number ending in 0889, held in the name Safwan Plumbing and Heating/SAFWAN MADARATI; and
- (e) \$21,108.58 seized from Bank of America account number ending in 7899, held in the name SAFWAN MADARATI.

2. If any of the property described in paragraph 1 above, as a result of any act or omission of the defendants,


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;


it is the intention of the United States, pursuant to Title 18 United States Code, Section 982(b)(1), incorporating Title 21 United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 1.

All pursuant to Title 18, United States Code, Section 982.

23

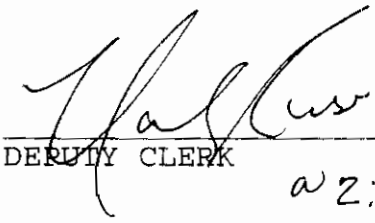
A TRUE BILL


FOREPERSON OF THE GRAND JURY


Neil J. Gallagher, Jr.
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS; May 19, 2011

Returned into the District Court by the Grand Jurors
and filed.


DEPUTY CLERK

at 2:48 P.M.